

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

<b>UNITED STATES OF AMERICA,</b>	§ § §
<b>Plaintiff,</b>	§ § §
<b>v.</b>	§ § § CRIMINAL NO. EP-20-CR-389-DCG
<b>PATRICK WOOD CRUSIUS,</b>	§ § §
<b>Defendant.</b>	§

**BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files the following Bill of Particulars for Forfeiture of Property.

The Superseding Indictment (ECF No. 82), returned on July 9, 2020, gave notice that the United States seeks the criminal forfeiture of properties pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c) from Defendant PATRICK WOOD CRUSIUS. Specifically, this Bill of Particulars seeks the criminal forfeiture of properties which are included herein.

The United States hereby gives notice that it seeks the criminal forfeiture of certain properties from the Defendant, for the violations of Title 18 U.S.C. §§ 924(c), 924(j)(1), as follows:

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
[See Fed. R. Crim. P. 32.2]

**I.**

**Firearms Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 924(c) and 924(j)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the foregoing criminal violations set forth in Counts Twenty-Four through Forty-Six, and Counts Sixty-Nine through Ninety of the Superseding Indictment, the United States

of America gives notice to the Defendant **PATRICK WOOD CRUSIUS** of its intent to seek the forfeiture of the properties described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Section 924 states, in pertinent part, the following:

**Title 18 U.S.C. § 924.**

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922, or knowing importation or bringing into the United States or any possession thereof any firearm or ammunition in violation of section 922(l), or knowing violation of section 924, shall be subject to seizure and forfeiture under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the properties described below in Paragraph II.

**II.**  
**Properties**

1. Romarm/Cugir, model GP WASR-10, .762 caliber semi-automatic rifle with serial number A1-65552-18;
2. Two 7.62 x 39 magazines;
3. Approximately 33 rounds of 7.62 x 39 caliber ammunition;
4. One .22 caliber cartridge;
5. One tactical helmet, and
6. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.

Respectfully submitted,

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

By:/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2022, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System, which will send notice to the following CM/ECF participants:

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/s/

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